

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DISABILITY RIGHTS NEW YORK,
CARLOS LEON AND STEPHANIE DIAZ,
on behalf of themselves and all others
similarly situated,

CASE NO: 1:22-cv-04493

Plaintiffs,

-against-

**DECLARATION OF
STEPHANIE DIAZ IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' 12(C) MOTION TO
DISMISS**

THE CITY OF NEW YORK, NEW YORK
CITY POLICE DEPARTMENT, NEW
YORK CITY DEPARTMENT OF
TRANSPORTATION, ERIC ADAMS, in
his official capacity as Mayor of the City of
New York, KEECHANT L. SEWELL, in
her official capacity as Commissioner of
the New York Police Department, and
YDANIS RODRIGUEZ, in his official
capacity as Commissioner of the New York
City Department of Transportation.
Defendants.

I, Stephanie Diaz, declare under penalty of perjury that the following is true and correct:

1. I am a plaintiff in the above captioned case.
2. I am a resident of New York City, and I have lived here for over thirty years.
3. I currently live in an apartment at 1560 Grand Concourse, in the Bronx, New York, at the corner of Grand Concourse and Mount Eden Mall.
4. I grew up in this apartment, where I lived from April 1990 to July 2017, and from June 2020 to present.

5. I lived in an accessible apartment and neighborhood in Brooklyn from June 2018 to June 2020.
6. I moved back to my family's Grand Concourse apartment in June 2020 to live with and support my mother after my father died.
7. I intend to remain in the Grand Concourse apartment for the foreseeable future.
8. I use, or attempt to use, the sidewalks, curb cuts, and pedestrian crosswalks in the East Mount Eden neighborhood every day.
9. I have a visual disability caused by keratoconus, a degenerative eye disease that affects the structure of the cornea, resulting in loss of vision.
10. I have difficulty perceiving depth and motion, particularly at night.
11. I have a three-year-old daughter.
12. I rely on the neighborhood's pedestrian pathways to run errands, visit friends and family, walk my dog, and take my daughter to appointments and activities.
13. I have difficulty navigating sidewalks, curb cuts, and cross walks that are uneven or are comprised, because of my vision loss and lack of depth perception.
14. I cannot always see obstacles or debris that I encounter when using pedestrian pathways because of my vision loss, and I have difficulty seeing if an object is moving or stationary.
15. I am often unable to navigate the pedestrian pathways in and around the East Mount Eden neighborhood safely, because I encounter so many physical barriers, specifically parked vehicles blocking the pedestrian pathways.
16. When cars are blocking the pedestrian crosswalk, I have to stand in traffic to be able to figure out if a vehicle is moving or is parked, which puts me in danger of injury or death.

17. I am often unable to safely walk my dog because I encounter so many physical barriers throughout the pedestrian pathways I walk in and around the East Mount Eden neighborhood.
18. I often feel like I am risking injury or death when I bring my daughter to our local parks because I encounter so many physical barriers throughout the pedestrian pathways I walk in and around the East Mount Eden neighborhood.
19. I am sometimes forced to walk with my young daughter in the street when I encounter these barriers.
20. I regularly take my daughter to activities in the East Mount Eden neighborhood, such as the library, the playground, and the park.
21. I also regularly go to the gym in the East Mount Eden neighborhood, sometimes by myself and sometimes with Carlos Leon.
22. While on the way to or from my home to the gym, I often encounter difficulties with level changes in the sidewalks and vehicles blocking the pedestrian pathways.
23. Due to limited depth perception as a result of my disability, I frequently trip on potholes and broken, jagged, or uneven parts of the pedestrian pathways, especially when it is dark outside.
24. I wear specialized scleral lenses to help manage my keratoconus.
25. I am advised to wear these lenses for no more than eight hours a day, but I must often wear them for up to sixteen hours because I need to be able to see so I can help Carlos Leon and our daughter navigate our inaccessible neighborhood.
26. Wearing my scleral lenses for more than the recommended amount of time can cause scarring on my eyeball and further damage my vision.

27. I noticed an increase in vehicles illegally blocking the curb cuts in and around the East Mount Eden neighborhood beginning around July 2020.
28. From January 20, 2021 through March 13, 2021, I recorded at least 45 illegally parking vehicles in front of curb cuts and ambulance-only lanes. Exhibit 1 – Excel spreadsheet of Parking Violations.
29. I tried tirelessly to report and resolve the problems I faced with the inaccessible pedestrian pathways in and around the East Mount Eden neighborhood, but the area remains inaccessible to me. Exhibit 2 – Photos of Vehicles Blocking Pedestrian Pathways.
30. I have repeatedly reported the illegally parked vehicles to 311 since September 2020, but my reports have been ignored. Exhibit 3 – 311 Reports.
31. In March 2021, I met with several leaders of the BronxCare Health Systems, including Hiram Torres, Vice President of Operations, Robert Sancho, Vice President of Development and External Affairs, James Dunne, and Assistant Vice President of Support and Operations, to report my concerns about the illegally parked vehicles with temporary COVID-19 Medical Health On-Street Parking Permits.
32. Nothing from my meeting with the BronxCare Health System's leadership resolved the problem.
33. On March 16, 2021, I contacted Vincent Fortino and Wilfredo Benitez of the NYPD Neighborhood Office to report my concerns about the illegally parked vehicles, but my communication did not resolve the problem.
34. On March 18, 2021, I contacted Edmund Asiedu, ADA Coordinator & Disability Service Facilitator at NYC Department of Transportation, to report my concerns about the

illegally parked vehicles between Grand Concourse and Weeks Ave on Mount Eden Mall, but my communication did not resolve the problem.

35. On March 18, 2021, I contacted Paul Philips, Bronx Community Board District Manager, to report my concerns about the illegally parked vehicles, but my communication did not resolve the problem.

36. On March 19, 2021, I understand that Paul Phillips referred my concerns to the BronxCare Health Systems.

37. On October 5, 2021, I contacted District 16 Bronx City Council to report my concerns about the illegally parked vehicles, but my communication did not resolve the problem.

38. On September 15, 2022, I contacted the office of Assemblywoman Latoya Joyner and discussed my concerns regarding the neighborhood's inaccessible pedestrian pathways.

39. I have regularly seen and encountered parked vehicles blocking the pedestrian pathways in my neighborhood.

40. Even before July 2020, I have encountered vehicles parked in the crosswalks, blocking my access along the pedestrian pathway.

41. The problem got significantly worse around July of 2020, and since then, vehicles routinely park in crosswalks and on sidewalks in a way that prevents me from getting around on the pedestrian pathway.

42. To date, vehicles continue to park in crosswalks and on the sidewalks, and the pedestrian pathways remain as inaccessible to me as when I filed this lawsuit on June 1, 2022.

43. I have noticed that emergency vehicles, such as ambulances, FDNY vehicles, and police cars, continue to block the sidewalks and crosswalks.

44. I have not noticed any decrease in the number of parked vehicles blocking the sidewalks, crosswalks, and curb cuts near Mount Eden Mall or anywhere else in the East Mount Eden neighborhood since June 2022.
45. When walking outside, I have not noticed any increase in parking violation ticketing, vehicle removals, or other enforcement activity by the NYPD since June 2022.
46. The current inaccessibility of my neighborhood has caused me significant emotional and physical harm.
47. In December 2021, I began working with a therapist to manage my mental health problems caused by the insurmountable barriers throughout the pedestrian pathways in and around the East Mount Eden neighborhood.
48. I have stopped walking around the East Mount Eden neighborhood as much as I used to, or would like to, because my neighborhood is inaccessible to me.
49. When I look out the window of my home and can see vehicles parked on the sidewalk blocking the sidewalk and crosswalks, I become immediately frustrated and do not want to go outside.
50. I experience mental exhaustion from not being able to spend time in my neighborhood without worrying about how the inaccessibility affects my safety or my family's safety.
51. As a result of my neighborhood's inaccessibility and the stress that it causes me, I am forced to drive to other neighborhoods to do grocery shopping or take my daughter to activities.
52. I do not want to drive, but I do so anyway because I am scared for my safety because of the inaccessible pedestrian pathways.

53. Since it is difficult and dangerous for my family to go to the park with our daughter, as Carlos Leon often must use his wheelchair on the street as a result of the blocked pedestrian pathways, we often drive to an accessible park in another neighborhood instead.

54. If the pedestrian pathways were accessible to me, I would not drive to complete activities such as grocery shopping, going to parks, attending functions, and other activities.

55. I am scared for my own safety and well-being if I encounter an emergency situation while using the pedestrian pathways and cannot navigate around the East Mount Eden neighborhood because of the insurmountable barriers in the pedestrian pathways.

56. For example, if I encountered a dangerous situation, I will be unable to remove myself from the danger because parked vehicles would block my way.

57. Since July 2020, I have taken photos of the barriers I have encountered in the pedestrian pathways in and around the East Mount Eden neighborhood.

58. I took the photos in Exhibit 2, and all photos accurately show the barrier I encountered when I took the photos.

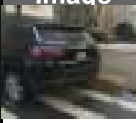







Dated: 10/6/2022

DocuSign
Stephanie Diaz



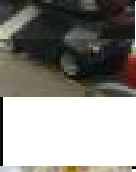






Diaz

Exhibit 1



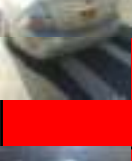
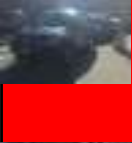




Excel Spreadsheet of Parking Violations

Image	Date	Time	Vehicle Color	Vehicle Make	Vehicle Model	License Plate	State	Permit #	Location
	01/20/2021	8:25 AM	BLACK	4X4	JEEP	EMT281	NY		SHERIDAN AVENUE & MT EDEN
	01/20/2021	8:25 AM	WHITE		HONDA	FRP7545	NY		SELWYN AVENUE & MT. EDEN
	01/20/2021	8:25 AM	LIGHT GREY		TOYOTA	GVFF27	FL		SELWYN AVENUE & MT. EDEN
	01/20/2021	8:25 AM	BURGANDY		HONDA	GZD3364	NY		SHERIDAN AVENUE & MT EDEN
	01/20/2021	8:25 AM	BLACK		HONDA	JAD5382	NY		SELWYN AVENUE & MT. EDEN
	01/20/2021	8:25 AM	DARK GREY	EXPLORE R	FORD	JLT9032	NY		SHERIDAN AVENUE & MT EDEN
	01/20/2021	8:25 AM	BLACK	ROGUE	NISSAN	JP6831	NY		SHERIDAN AVENUE & MT EDEN
	01/20/2021	8:25 AM	BLACK/DARK BLUE		VOLKSWAG EN	JRD1451	NY		SHERIDAN AVENUE & MT EDEN

000004

	01/20/2021	8:25 AM	DARK GREY		INFINITI	KED7220	NY		SHERIDAN AVENUE & MT EDEN
	01/20/2021	8:25 AM	BURGANDY		TOYOTA	MD95594	NY		SELWYN AVENUE & MT. EDEN
	01/21/2021	8:24 AM	BLACK	X3	BMW	EMT339	NY		SELWYN AVENUE & MT. EDEN
	01/21/2021	8:24 AM	BLACK	WRANGLE R	JEEP	HWL4658	NY		SHERIDAN AVENUE & MT EDEN
	01/21/2021	8:24 AM	LIGHT GREY		CHRYSLER	HXH3972	NY		SHERIDAN AVENUE & MT EDEN
	01/21/2021	8:24 AM	BLACK		HONDA	JAD5382	NY		SELWYN AVENUE & MT. EDEN
	01/21/2021	8:24 AM	LIGHT GREY	TAURUS	FORD	JJS3843	NY		SELWYN AVENUE & MT. EDEN
	01/21/2021	8:24 AM	BLACK	EXPLORE R	FORD	JLT9032	NY		MORRIS AVENUE & MT EDEN
	01/21/2021	8:24 AM	BURGANDY	HIGHLAN DER	TOYOTA	MD95594	NY		SELWYN AVENUE & MT. EDEN

	01/21/2021	8:24 AM	BLUE		FORD	T62KRS	NJ		SHERIDAN AVENUE & MT EDEN
	01/22/2021	9:04 AM	BURGANDY		HONDA	GZD3364	NY		MORRIS AVENUE & MT EDEN
	01/22/2021	9:04 AM	LIGHT GREY	TAURUS	FORD	JJS3843	NY		SELWYN AVENUE & MT. EDEN
	01/22/2021	9:04 AM	BURGANDY	HIGHLAN DER	TOYOTA	MD95594	NY		SELWYN AVENUE & MT. EDEN
	01/23/2021	10:55 AM	BLACK		TOYOTA	EJK8923	NY		SHERIDAN AVENUE & MT EDEN
	01/23/2021	10:55 AM	WHITE		HONDA	EMT1346	NY		SHERIDAN AVENUE & MT EDEN
	01/23/2021	10:55 AM	BLACK	RX400H	LEXUS	FMB6715	N		SELWYN AVENUE & MT. EDEN
	01/23/2021	9:44 PM	LIGHT GREY	TAURUS	FORD	JJS3843	NY		SELWYN AVENUE & MT. EDEN

	01/23/2021	10:55 AM	LIGHT GREY	TAURUS	FORD	JJS3843	NY		SELWYN AVENUE & MT. EDEN
	01/23/2021	10:55 AM	DARK GREY		INFINITI	KED7220	NY		SHERIDAN AVENUE & MT EDEN
	01/24/2021	10:56 AM	LIGHT GREY	TAURUS	FORD	JJS3843	NY		SELWYN AVENUE & MT. EDEN
	01/24/2021	10:57 AM	BLACK		VOLKSWAGEN	JRD1451	NY		SHERIDAN AVENUE & MT EDEN
	01/24/2021	10:57 AM	WHITE/LIGHT GREY	ELANTRA	HYUNDAI	MD6581	NJ		SHERIDAN AVENUE & MT EDEN
	3/8/2021	4:55 PM	GREY	ALTIMA	NISSAN	EYC5657	NY	8034	SELWYN AVENUE & MT. EDEN
	3/8/2021	4:55 PM	BLACK	ROGUE	NISSAN	GEX7681	NY	3819	SELWYN AVENUE & MT. EDEN
	3/8/2021	4:56 PM	GREY		TOYOTA	GVFF27	FL		SELWYN AVENUE & MT. EDEN


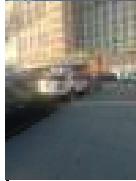
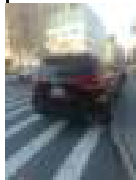




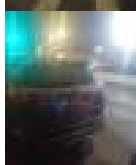

	3/8/2021	4:57 PM	BLACK	ALTIMA	NISSAN	HKP3721	NY		SHERIDAN AVENUE & MT EDEN
	3/8/2021	4:56 PM	WHITE	EXPLORE R	FORD	JDG2931	NY		SHERIDAN AVENUE & MT EDEN
	3/8/2021	4:55 PM	BURGANDY	HIGHLAN DER	TOYOTA	MD95594	NY		SELWYN AVENUE & MT. EDEN
	3/12/2021	10:18 PM	BLUE		CHEVROLET	934752R	NJ		MT EDEN & GRAND CONCOURSE
	3/12/2021	10:18 PM	WHITE	RX350	LEXUS	EXZ2471	NY		MT EDEN & GRAND CONCOURSE
	3/12/2021	10:13 PM	GREY		TOYOTA	GVFF27	FL		SELWYN AVENUE & MT. EDEN
	3/12/2021	10:17 PM	WHITE	S80	VOLVO	GVR3616	NY		SHERIDAN AVENUE & MT EDEN
	3/12/2021	10:19 PM	GREY		TOYOTA	HCZ1579	NY		MT EDEN & GRAND CONCOURSE
	3/12/2021	10:16 PM	BLACK		HONDA	KEM3931	NY		SHERIDAN AVENUE & MT EDEN

Exhibit 2

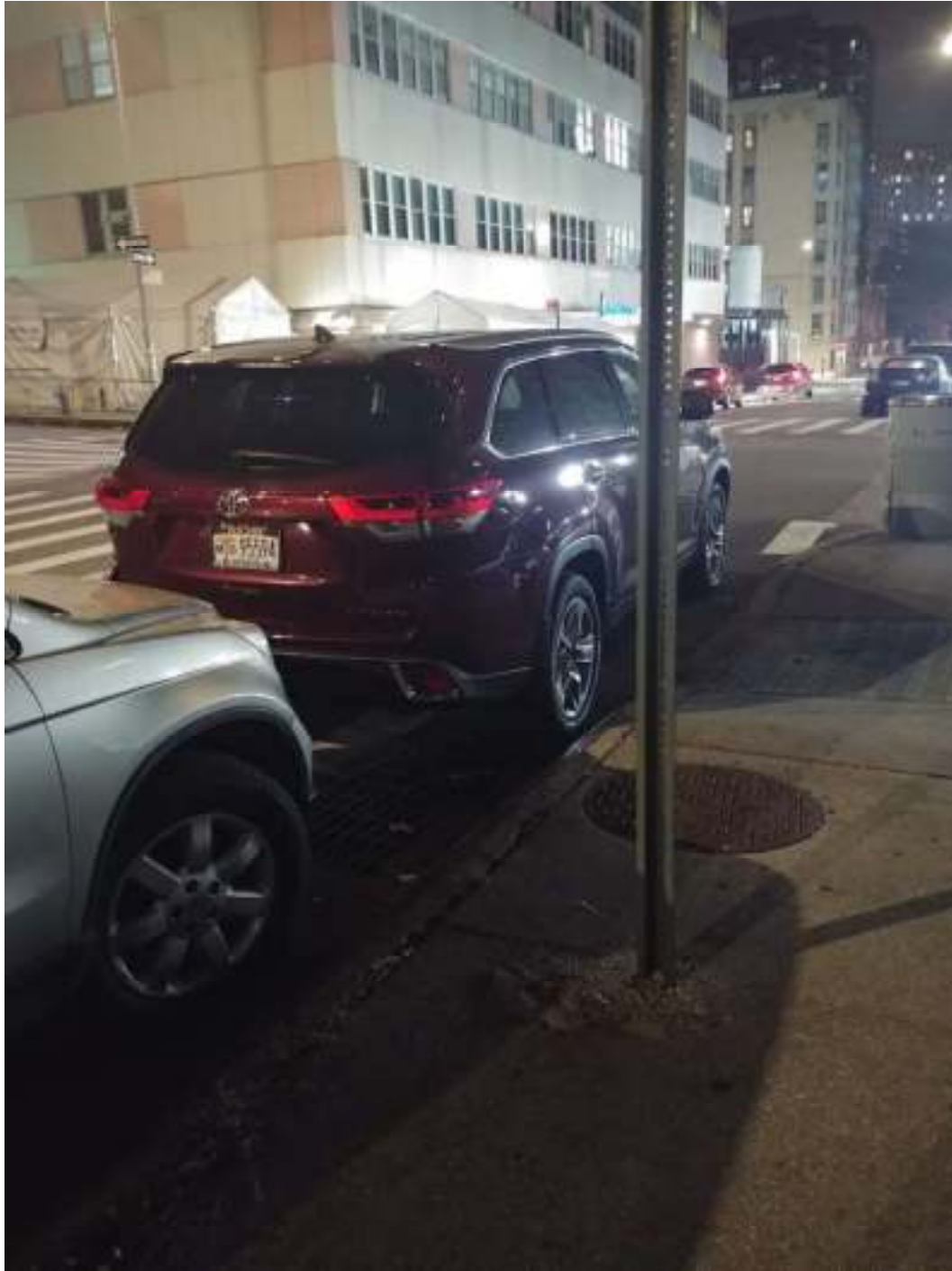
**Photos of Vehicles in Pedestrian Pathways
October 19, 2020 – October 3, 2022**



October 19, 2020 @ 12:31PM – Selwyn Ave & Mt. Eden Parkway



October 24, 2020 @ 4:56PM – Selwyn Ave & Mt. Eden Parkway



October 25, 2020 @ 8:56PM – Selwyn Ave & Mt. Eden Parkway



October 25, 2020 @ 8:57 PM – Selwyn Ave & Mt. Eden Parkway



October 28, 2020 @ 1:08PM – Morris Ave & Mt. Eden Parkway



October 28, 2020 @ 1:09PM – Morris Ave & Mt. Eden Parkway



October 28, 2020 @ 1:13PM – Selwyn Ave & Mt. Eden Parkway



October 28, 2020 @ 1:13PM – Selwyn Ave & Mt. Eden Parkway



October 28, 2020 @ 1:14PM – Sheridan Ave & Mt. Eden Parkway



October 28, 2020 @ 1:15PM – Sheridan Ave & Mt. Eden Parkway



March 8, 2021 @ 4:55PM – Selwyn Ave & Mt. Eden Parkway



March 12, 2021 @ 10:12 PM – Selwyn Ave & Mt. Eden Parkway



March 12, 2021 @ 10:17PM – Sheridan Ave & Mt. Eden Parkway



March 16, 2021 @ 4:53PM – Selwyn Ave & Mt. Eden Parkway



April 4, 2021 @ 10:24AM - Morris Ave & Mt. Eden Parkway



April 4, 2021 @ 10:26AM – Selwyn Ave & Mt. Eden Parkway



April 27, 2021 @ 7:08PM - Sheridan Ave & Mt. Eden Parkway



May 10, 2021 @ 7:43AM – Sheridan Ave & Mt. Eden Parkway



May 10, 2021 @ 7:44AM – Sheridan Ave & Mt. Eden Parkway



May 10, 2021 @ 7:44AM – Sheridan Ave & Mt. Eden Parkway



May 11, 2021 @ 5:59PM – Sheridan Ave & Mt. Eden Parkway



January 22, 2022 @ 2:11PM – Morris Ave & Mt. Eden Parkway



January 24, 2022 @ 10:54AM – Eastburn Ave & Mt. Eden Parkway



January 27, 2022 @ 3:20PM – Sheridan Ave & Mt. Eden Parkway



January 31, 2022 @ 1:10PM – Sheridan Ave & Mt. Eden Parkway



January 31, 2022 @ 1:14PM – Eastburn Avenue & Mt. Eden Parkway



February 2, 2022 @ 8:50AM – Sheridan Ave and Mt. Eden Parkway



February 2, 2022 @ 8:51AM – Sheridan Ave and Mt. Eden Parkway



February 2, 2022 @ 9:03AM – Weeks Ave & Mt. Eden Parkway



February 4, 2022 @ 3:07PM – Sheridan Ave & Mt. Eden Parkway



February 15, 2022 @ 2:18PM - Sheridan Ave & Mt. Eden Parkway



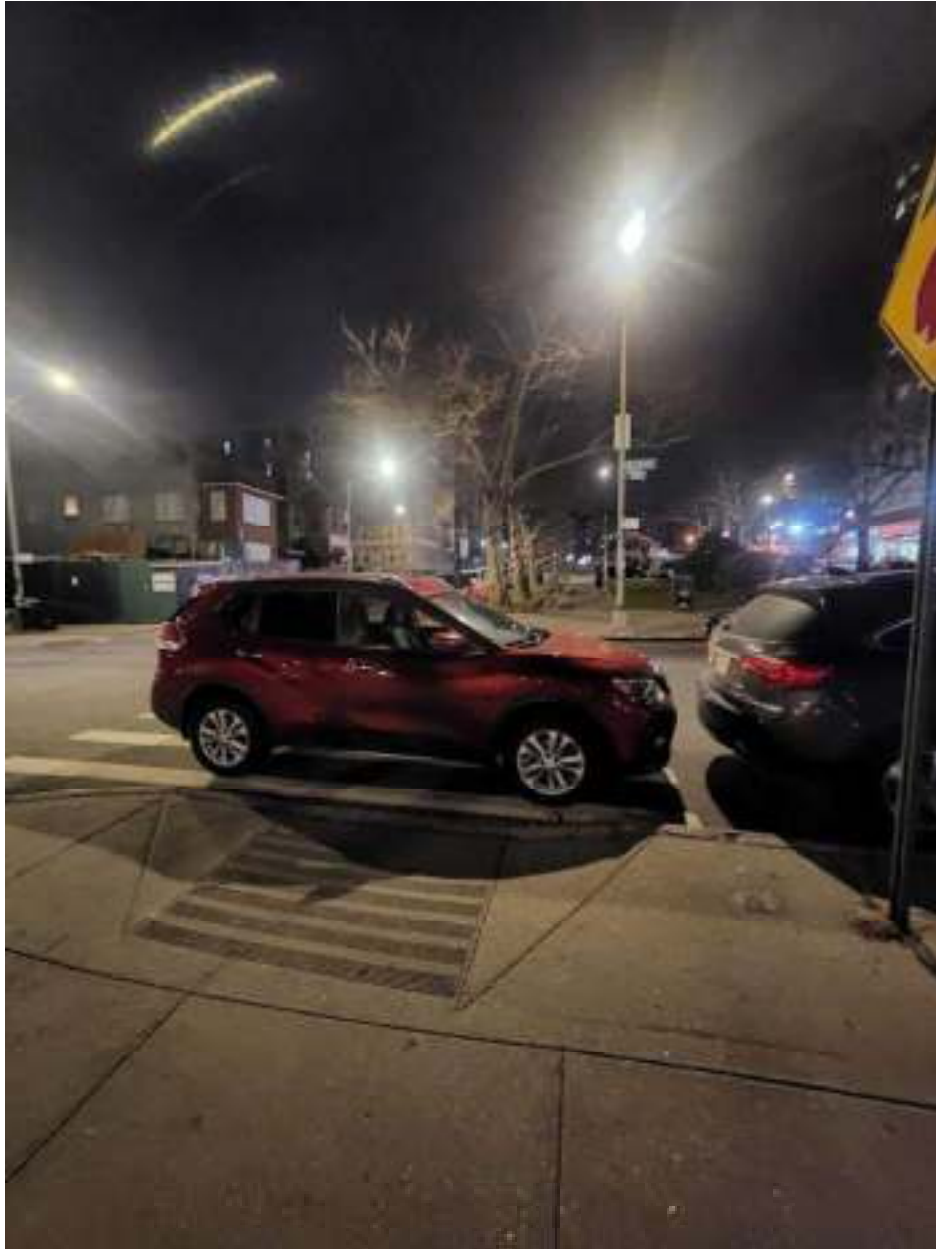
February 16, 2022 @ 11:59 PM – Selwyn Ave & Mt. Eden Parkway



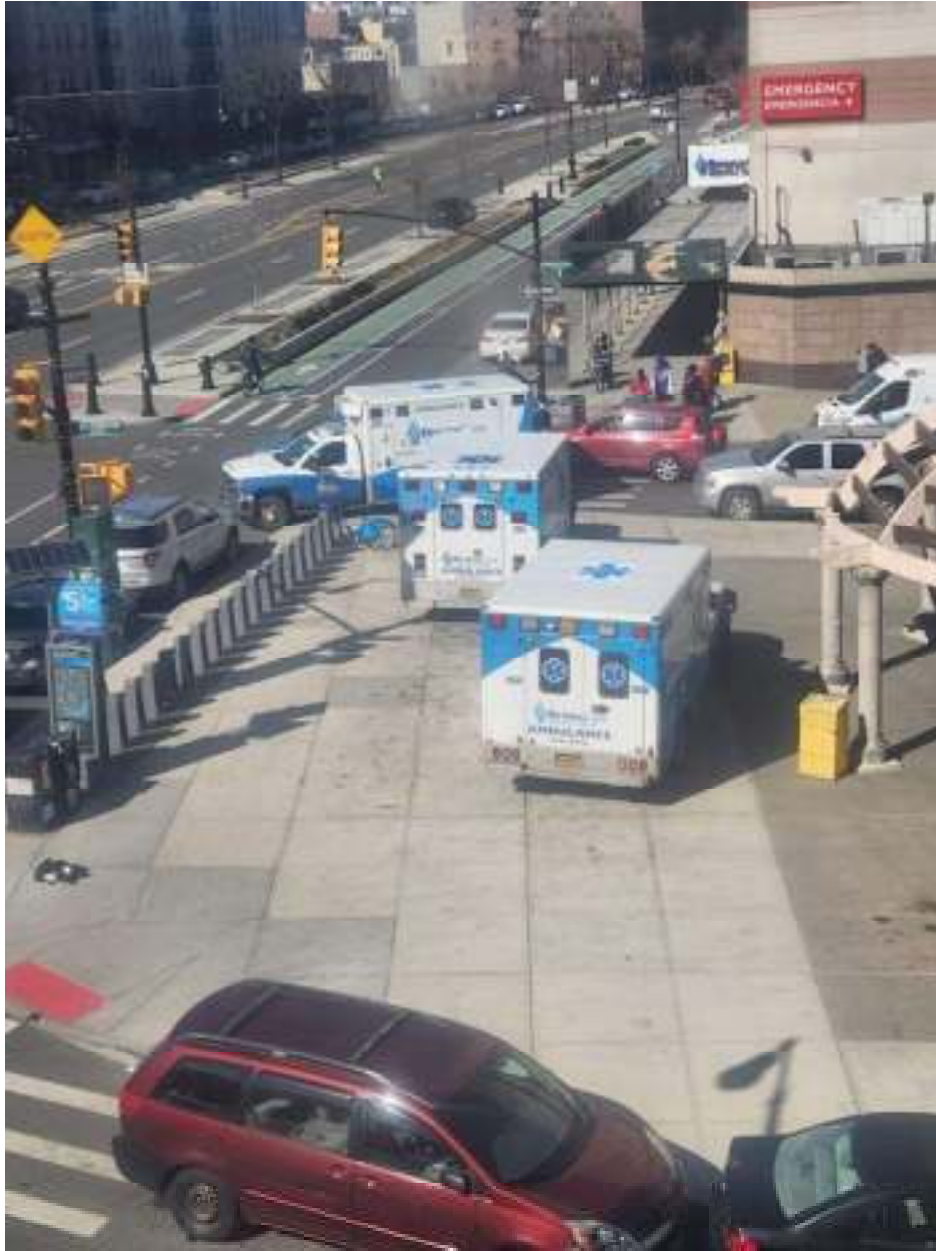
February 17, 2022 @ 12:01 AM – Morris Ave & Mt. Eden Parkway



March 20, 2022 @ 9:58 AM – Selwyn Ave & Mt. Eden Parkway



March 20, 2022 @ 9:34 PM – Selwyn Ave & Mt. Eden Parkway



March 21, 2022 @ 3:15PM – Grant Concourse and Mt. Eden Parkway



March 21, 2022 @ 3:31PM – Selwyn Ave & Mt. Eden Parkway



March 22, 2022 @ 11:36 AM – Selwyn Ave & Mt. Eden Parkway



March 22 @ 11:36AM – Sheridan Ave & Mt. Eden Parkway



March 23, 2022 @ 11:22AM – Sheridan Ave & Mt. Eden Parkway



March 25, 2022 @ 8:45PM – Selwyn Ave & Mt. Eden Parkway



March 29, 2022 @ 8:27AM – Sheridan Ave & Mt. Eden Parkway



March 29, 2022 @ 8:29AM – Sheridan Ave & Mt. Eden Parkway



March 29, 2022 @ 8:29AM – Selwyn Ave & Mt. Eden Parkway



March 29, 2022 @ 9:49AM – Sheridan Ave & Mt. Eden Parkway



March 29, 2022 @ 11:08AM – Grand Concourse @ Mt. Eden Parkway



March 29, 2022 @ 4:22PM – Grand Concourse & Mt. Eden Parkway



March 29, 2022 @ 7:02PM – Grand Concourse & Mt. Eden Parkway



March 29 @ 7:02PM – Sheridan Ave & Mt. Eden Parkway



March 30, 2022 @ 11:12PM – Sheridan Ave & Mt. Eden Parkway



March 30, 2022 @ 11:12PM – Sheridan Ave & Mt. Eden Parkway



March 31, 2022 @ 9:23AM – Sheridan Ave & Mt. Eden Parkway



March 31, 2022 @ 9:24AM – Selwyn Ave & Mt. Eden Parkway



March 31, 2022 @ 9:25AM – Selwyn Ave & Mt. Eden Parkway



March 31, 2022 @ 7:22PM – Grand Concourse & Mt. Eden Parkway



March 31, 2022 @ 7:22PM – Sheridan Ave & Mt. Eden Parkway



April 14, 2022 @ 2:11PM – Grand Concourse & Mt. Eden Parkway



April 15, 2022 @ 9:31AM – Selwyn Ave & Mt. Eden Parkway



April 15, 2022 @ 9:32AM – Sheridan Ave & Mt. Eden Parkway



May 11, 2022 – Selwyn Ave & Mt. Eden Parkway



May 11, 2022 – Selwyn Ave & Mt. Eden Parkway



May 11, 2022 – Sheridan Ave & Mt. Eden Parkway



May 11, 2022 – Sheridan Ave & Mt. Eden Parkway



May 11, 2022 – Sheridan Ave & Mt. Eden Parkway



May 12, 2022 – Selwyn Ave & Mt. Eden Parkway



May 12, 2022 – Selwyn Ave & Mt. Eden Parkway



May 12, 2022 – Morris Ave & Mt. Eden Parkway



May 12, 2022 – Sheridan Ave & Mt. Eden Parkway



July 1, 2022 @ 10:20PM – Selwyn Ave & Mt. Eden Parkway



July 1, 2022 @ 10:21PM – Selwyn Ave & Mt. Eden Parkway



July 1, 2022 @ 10:22PM –Sheridan Ave & Mt. Eden Parkway



July 4, 2022 @ 1:40AM – Sheridan Ave & Mt. Eden Parkway



July 5, 2022 @ 10:20PM – Selwyn Ave & Mt. Eden Parkway



July 5, 2022 @ 10:21PM – Sheridan Ave & Mt. Eden Parkway



July 6, 2022 @ 8:22PM – Selwyn Ave & Mt. Eden Parkway



July 6, 2022 @ 8:30PM – Selwyn Ave & Mt. Eden Parkway



5

July 6, 2022 @ 8:31PM – Sheridan Ave & Mt. Eden Parkway



July 7, 2022 @ 9:16AM – Sheridan Ave & Mt. Eden Parkway



July 7, 2022 @ 4:20PM – Sheridan Ave & Mt. Eden Parkway



July 7, 2022 @ 4:22PM – Morris Ave & Mt. Eden Parkway



July 10, 2022 @ 9:23AM – Sheridan Ave & Mt. Eden Parkway



July 10, 2022 @ 9:24AM – Selwyn Ave & Mt. Eden Parkway



July 10, 2022 @ 9:25AM – Morris Ave & Mt. Eden Parkway



July 10, 2022 @ 10:14AM – Sheridan Ave & Mt. Eden Parkway



July 26, 2022 @ 4:36PM – Sheridan Ave & Mt. Eden Parkway



July 29, 2022 @ 9:56AM – Grand Concourse & Mt. Eden Parkway



August 8, 2022 @ 3:11PM – Grand Concourse & Mt. Eden Parkway



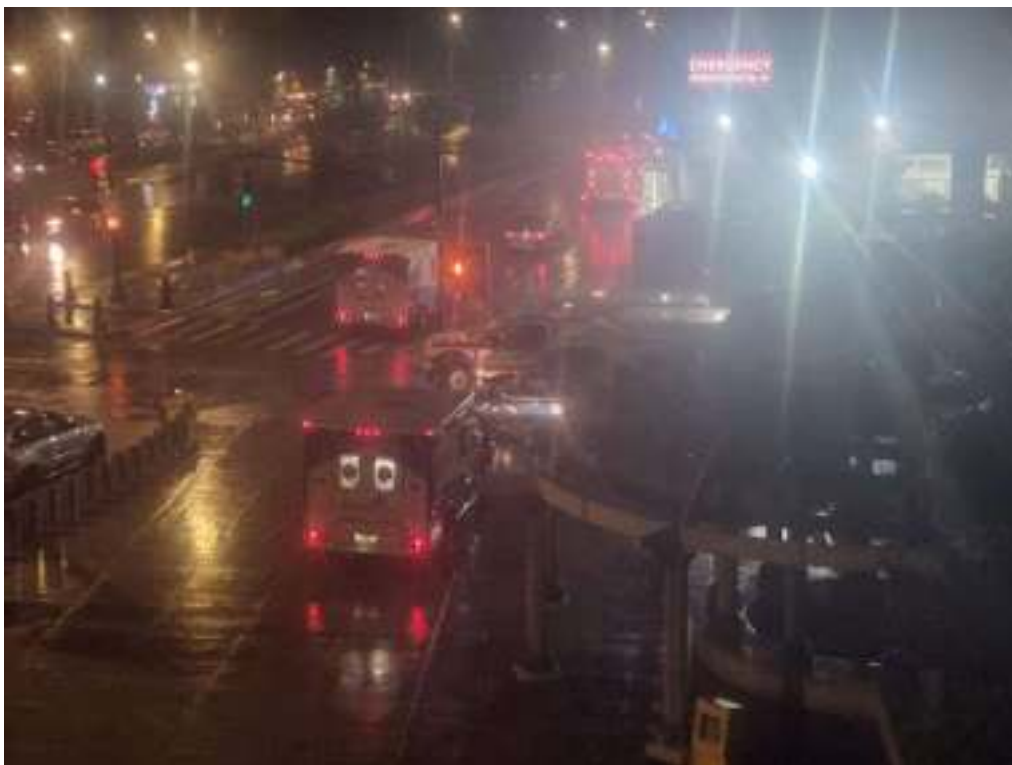
August 15, 2022 @ 1:16PM – Sheridan Ave & Mt. Eden Parkway



August 15 @ 1:17PM – Sheridan Ave & Mt. Eden Parkway



August 15, 2022 @ 1:19PM – Sheridan Ave & Mt. Eden Parkway



August 17, 2022 @ 9:25PM – Grand Concourse & Mt. Eden Parkway



August 18, 2022 @ 8:15AM – Grand Concourse & Mt. Eden Parkway



August 18, 2022 @ 9:25AM – Grand Concourse & Mt. Eden Parkway



August 18, 2022 @ 2:20PM – Selwyn Ave & Mt. Eden Parkway



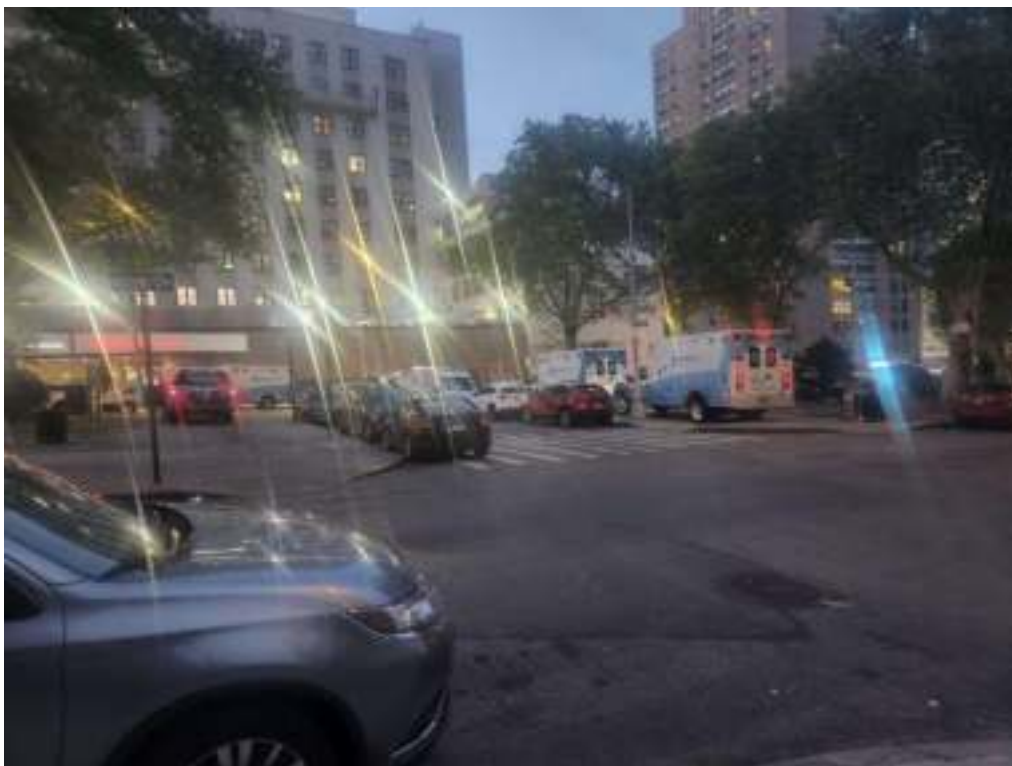
August 18, 2022 @ 2:24PM – Sheridan Ave & Mt. Eden Parkway



August 18, 2022 @ 2:25PM – Sheridan Ave & Mt. Eden Parkway



August 18, 2022 @ 4:08PM – Grand Concourse & Mt. Eden Parkway



August 25, 2022 @ 7:53PM – Sheridan Ave & Mt. Eden Parkway



August 25, 2022 @ 9:01 PM – Sheridan Ave & Mt. Eden Parkway



September 2, 2022 @ 6:07PM – Sheridan Ave & Mt. Eden Parkway



September 2, 2022 @ 2:54PM – Grand Concourse & Mt. Eden Parkway



September 7, 2022 @ 2:19PM – Sheridan Ave & Mt. Eden Parkway



September 7, 2022 @ 2:19PM – Sheridan Ave & Mt. Eden Parkway



September 7, 2022 @ 2:20PM – Selwyn Ave & Mt. Eden Parkway



September 7, 2022 @ 2:21PM – Morris Ave & Mt. Eden Parkway



September 7, 2022 @ 5:52PM – Sheridan Ave & Mt. Eden Parkway



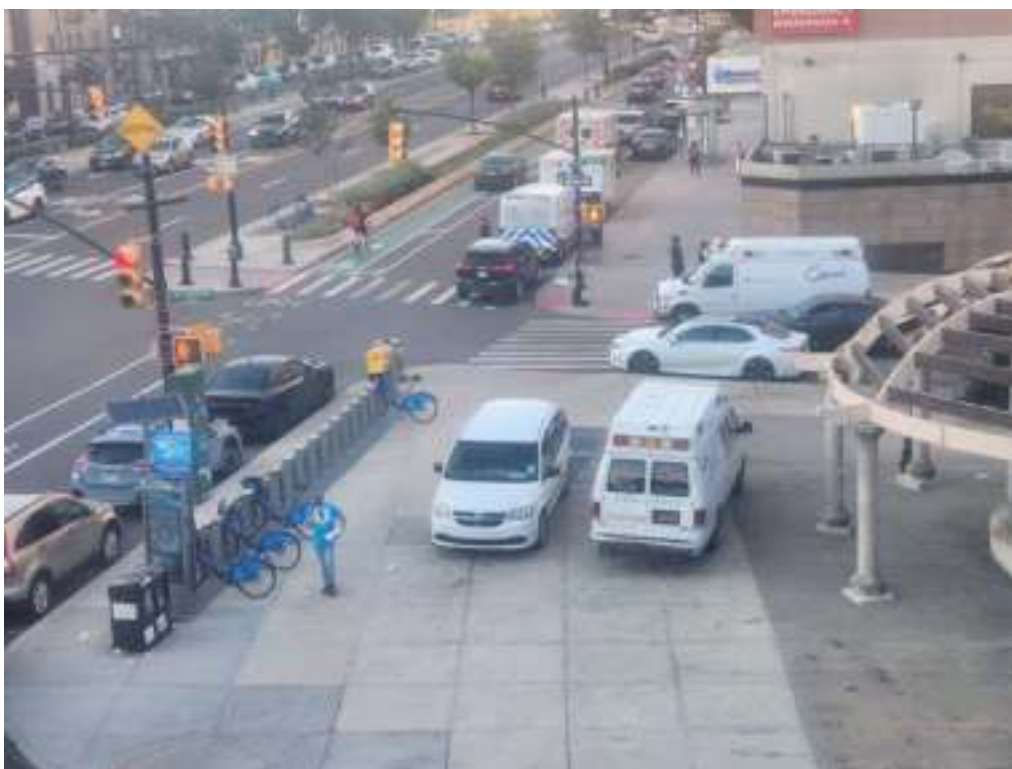
September 8, 2022 @ 9:32AM – Grand Concourse & Mt. Eden Parkway



September 12, 2022 @ 6:55PM – Sheridan Ave & Mt. Eden Parkway



September 15, 2022 @ 6:30PM – Grand Concourse & Mt. Eden Parkway



September 15, 2022 @ 6:37PM – Grand Concourse & Mt. Eden Parkway



September 15, 2022 @ 7:23PM – Sheridan Ave & Mt. Eden Parkway



September 15, 2022 @ 7:29PM – Sheridan Ave & Mt. Eden Parkway



September 15, 2022 @ 7:28PM – Selwyn Ave & Mt. Eden Parkway



September 17, 2022 @ 1:25AM – Grand Concourse & Mt. Eden Parkway



September 17, 2022 @ 12:38PM – Grand Concourse & Mt. Eden Parkway



September 17, 2022 @ 7:04PM – Grand Concourse & Mt. Eden Parkway



September 18, 2022 @ 1:23PM – Grand Concourse & Mt. Eden Parkway



September 19, 2022 @ 10:35AM – Grand Concourse & Mt. Eden Parkway



September 19, 2022 @ 11:54AM – Grand Concourse & Mt. Eden Parkway



September 19, 2022 @ 12:01PM – Grand Concourse & Mt. Eden Parkway



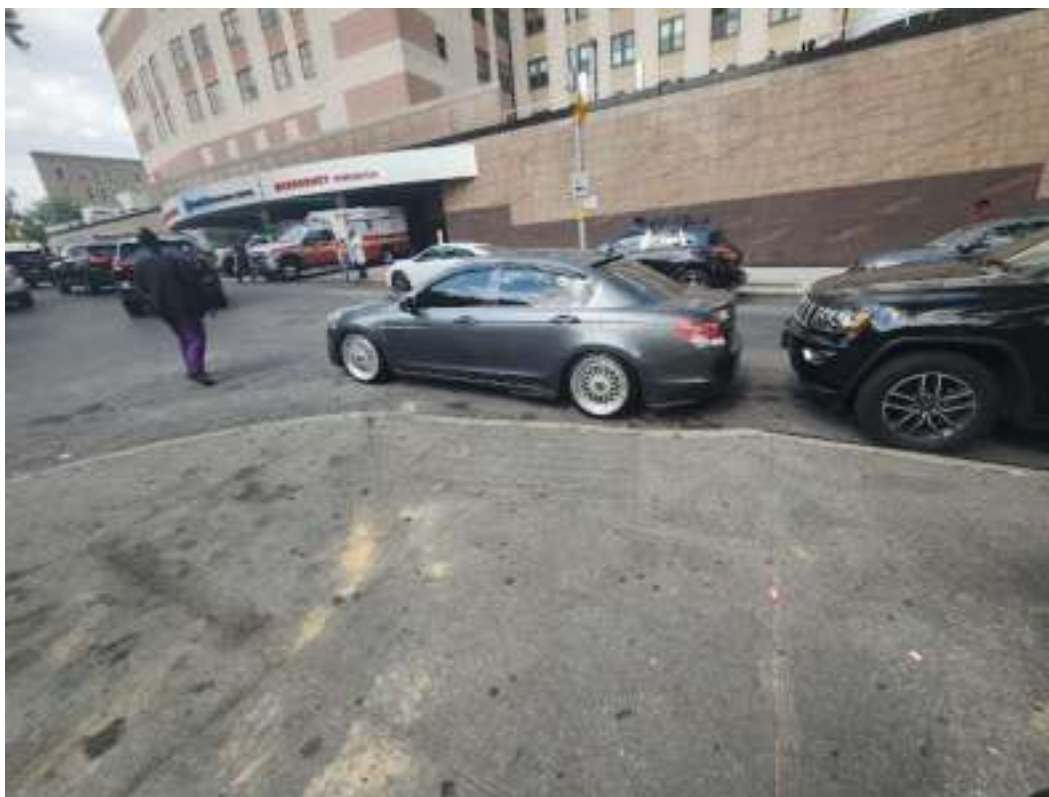
September 19, 2022 @ 1:25PM – Sheridan Ave & Mt. Eden Parkway



September 19, 2022 @ 1:26PM – Selwyn Ave & Mt. Eden Parkway



September 19, 2022 @ 1:28PM – Selwyn Ave & Mt. Eden Parkway



September 19, 2022 @ 1:29PM – Sheridan Ave & Mt. Eden Parkway



September 20, 2022 @ 7:29AM – Grand Concourse & Mt. Eden Parkway



September 20, 2022 @ 1:18PM – Grand Concourse & Mt. Eden Parkway



September 20, 2022 @ 3:53PM – Grand Concourse & Mt. Eden Parkway



September 21, 2022 @ 2:01PM – Grand Concourse & Mt. Eden Parkway



September 23, 2022 @ 7:40PM – Grand Concourse & Mt. Eden Parkway



September 27, 2022 @ 5:53PM – Sheridan Ave & Mt. Eden Parkway



September 27, 2022 @ 6:40PM – Sheridan Ave & Mt. Eden Parkway



September 27, 2022 @ 5:53PM – Grand Concourse & Mt. Eden Parkway



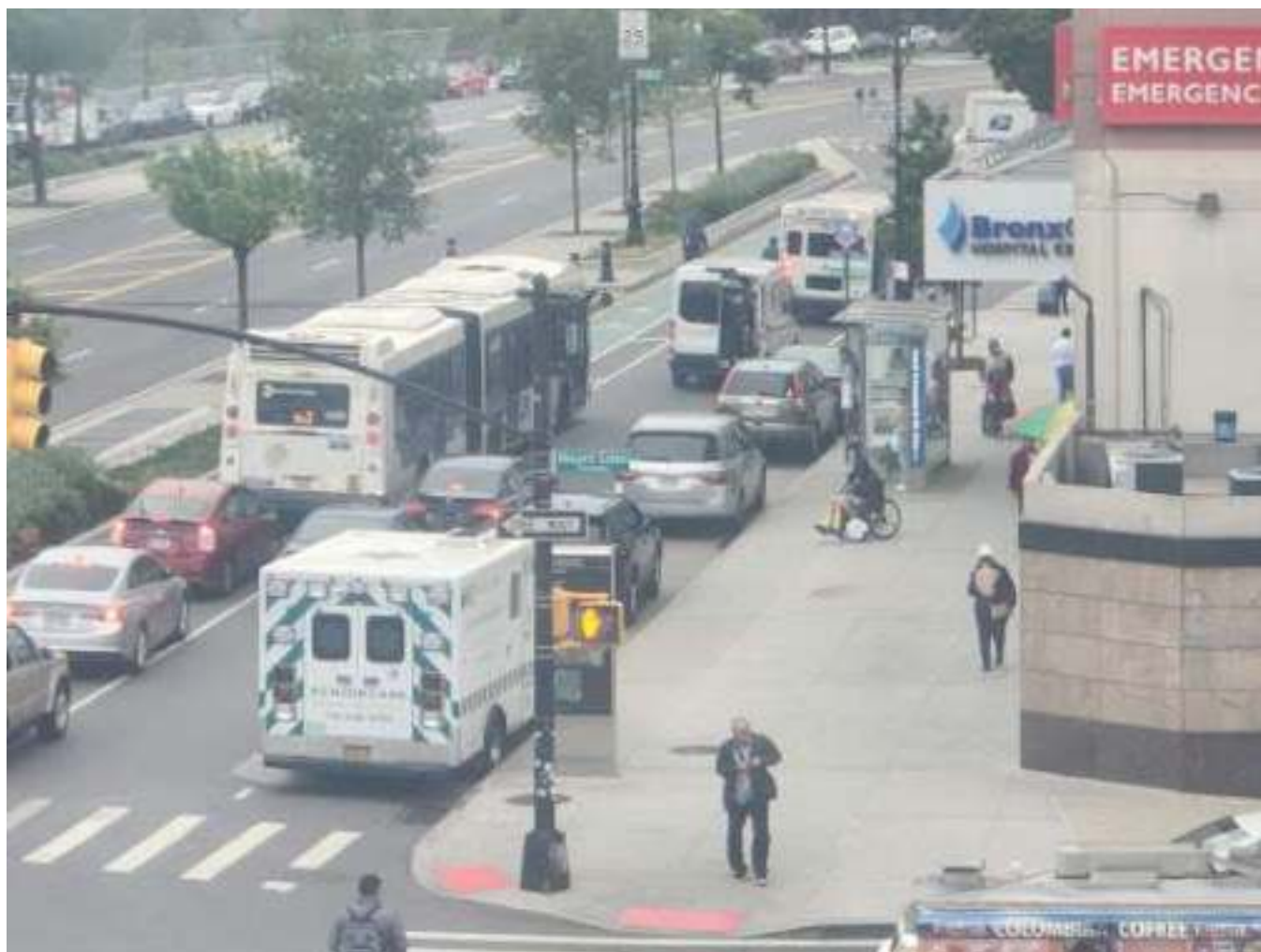
September 27, 2022 @ 6:40PM – Grand Concourse & Mt. Eden Parkway



September 29, 2022 @ 11:48AM - Grand Concourse & Mt. Eden Parkway



October 2, 2022 @ 7:23PM – Grand Concourse & Mt. Eden Parkway



October 3, 2022 @ 1:48PM – Grand Concourse & Mt. Eden Parkway



October 3, 2022 @ 4:41PM – Grand Concourse & Mt. Eden Parkway



October 3, 2022 @ 5:04PM – Grand Concourse & Mt. Eden Parkway

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Exhibit 3

311 Reports

September 18, 2020 – September 26, 2022

Date Submitted	Time Submitted	Request #	Request Type	Location of Complaint	Description of Complaint	Date Response	Time Response	Description of Response
9/18/2020	9:21 PM	311-04008844	Illegal Parking	170 East Mt Eden Avenue, Bronx	Various cars keep parking on crosswalk ramps blocking access for wheelchair users as well as parking in 'no parking' locations without	9/18/2021	10:19 PM	The Police Department reviewed your complaint and provided additional information below.
9/21/2020	5:32 PM	311-04041561	Illegal Parking	184 East Mt Eden Avenue, Bronx	Various cars keep parking on crosswalk ramps blocking access for wheelchair users as well as parking in 'no parking' locations without	9/21/2020	6:19 PM	The Police Department reviewed your complaint and provided additional information below.
10/19/2020	12:40 PM	311-04335121	City Vehicles or Permits	178 East Mt Eden Avenue, Bronx	Various cars are parked on the crosswalk which prevents people with wheelchairs and strollers from crossing the street	10/19/2020	4:36 PM	The Police Department responded to the complaint and with the information available observed no evidence of the violation at
10/24/2020	5:00 PM	311-04388519	City Vehicles or Permits	184 East Mt Eden Avenue, Bronx	Various cars continue to park on the crosswalk making it inaccessible for	10/24/2020	5:43 PM	The Police Department responded and upon arrival those responsible for the
10/25/2020	9:28 PM	311-04401369	City Vehicles or Permits	184 East Mt Eden Avenue, Bronx	Various cars continue to park on the crosswalk making it inaccessible for wheelchair users to cross	10/25/2020	10:19 PM	The Police Department responded to the complaint and took action to fix the condition.
10/25/2020	9:29 PM	311-04401385	City Vehicles or Permits	170 East Mt Eden Avenue, Bronx	Various cars continue to park on the crosswalk making it inaccessible for wheelchair users to cross the street safely	10/25/2020	11:11 PM	The Police Department responded to the complaint and with the information available observed no evidence of the violation at
11/18/2020	7:36 PM	311-04637534	City Vehicles or Permits	150 East Mt Eden Avenue, Bronx	Driver parked on crosswalk preventing wheelchair user from crossing the street	11/18/2020	8:18 PM	The Police Department responded to the complaint and took action to fix the

1/20/2021	8:17 AM	311-05185662	Illegal Parking - Blocked Sidewalk	East Mt Eden Avenue and Sheridan Avenue, Bronx	Complaint made via phone. This is just the complaint submission confirmation, no response from NYPD.			NYPD will respond within 8 hours.
1/20/2021	8:17 AM	311-05185662	Illegal Parking - Blocked Sidewalk	East Mt Eden Avenue and Sheridan Avenue, Bronx	Complaint made via phone. This is just the complaint submission confirmation, no response from NYPD.			NYPD will respond within 8 hours.
3/3/2021	7:03 PM	311-05572514	City Vehicles or Permits	181 East Mt Eden Avenue, Bronx	Various cars continue to park on the crosswalks of several blocks making it impossible for wheelchairs to cross the street safely. This issue has been happening for almost a year and no tickets have been issued despite it being reported to various	3/3/2021	10:25 PM	The Police Department responded to the complaint and took action to fix the condition.
3/16/2021	7:05 PM	311-05701722	City Vehicles or Permits	170 East Mt Eden Avenue, Bronx	Various cars continue to park in front of the pedestrian ramps every day, blocking access to	3/16/2021	7:43 PM	The Police Department responded to the complaint and took action to fix the condition.
4/14/2021	2:18 PM	311-05966010	City Vehicles or Permits	170 East Mt Eden Avenue, Bronx	Various cars with DOT medical parkngi permits continue to park on marked	4/14/2021	3:01 PM	The Police Department responded to the complaint and took action to fix the
4/14/2021	2:21 PM	311-05966043	Illegal Parking	178 East Mt Eden Avenue, Bronx	Various cars continue to park on pedestrian ramps everyday	4/14/2021	3:02 PM	The Police Department reviewed your complaint and provided additional
9/7/2021	11:04 AM	311-07570156	City Vehicles or Permits	181 East Mt Eden Avenue, Bronx	Many cars with city permits block the crosswalks 24/7 ciolating the rights of people who use wheelchairs or	9/7/2021	11:40 AM	The Police Department issued a summons in response to the complaint.

9/15/2021	11:24 PM	311-03975243	Illegal Parking	170 East Mt Eden Avenue, Bronx	Various cars keep parking on crosswalk ramps blocking access for wheelchair users as well as parking in 'no parking' locations without	9/16/2021	2:34 AM	The Police Department responded to the complaint and with the information available observed no evidence of the violation at
10/4/2021	8:21 PM	311-07904545	City Vehicles or Permits	170 East Mt Eden Avenue, Bronx	Cars with medical permit plates continue to park on the crosswalk prohibiting wheelchair users from crossing the street safely. Which has been an issue in	10/4/2021	9:15 PM	The Police Department issued a summons in response to the complaint.
10/4/2021	8:23 PM	311-07904564	City Vehicles or Permits	170 Mt Eden Parkway, Bronx	Cars with medical permit plates continue to park on the crosswalk prohibiting wheelchair users from crossing the street safely. Which has been an issue in	10/4/2021	9:15 PM	The Police Department responded to the complaint and took action to fix the condition.
10/5/2021	11:17 AM	311-07909699	City Vehicles or Permits	170 Mt Eden Parkway, Bronx	The pedestrian ramps in my neighborhood are constantly blocked by vehicles with medical parking permits from Bronxcare Hospital Systems employees which is	10/5/2021	11:42 AM	The Police Department responded to the complaint and took action to fix the condition.
10/5/2021	11:18 AM	311-07909713	City Vehicles or Permits	170 Mt Eden Parkway, Bronx	The pedestrian ramps in my neighborhood are constantly blocked by vehicles with medical parking permits from Bronxcare Hospital Systems employees which is	10/5/2021	11:43 AM	The Police Department responded to the complaint and took action to fix the condition.

10/5/2021	11:19 AM	311-07909735	City Vehicles or Permits	170 Mt Eden Parkway, Bronx	The pedestrian ramps in my neighborhood are constantly blocked by vehicles with medical parking permits from Bronxcare Hospital Systems employees which is	10/5/2021	11:44 AM	The Police Department responded to the complaint and took action to fix the condition.
10/5/2021	11:22 AM	311-07909755	City Vehicles or Permits	170 Mt Eden Parkway, Bronx	The pedestrian ramps in my neighborhood are constantly blocked by vehicles with medical parking permits from Bronxcare Hospital Systems employees which is	10/5/2021	11:44 AM	The Police Department responded to the complaint and took action to fix the condition.
10/5/2021	11:25 AM	311-08726230	City Vehicles or Permits	170 Mt Eden Parkway, Bronx	The pedestrian ramps in my neighborhood are constantly blocked by vehicles with medical parking permits from Bronxcare Hospital Systems employees which is	10/5/2021	11:45 AM	The Police Department responded to the complaint and took action to fix the condition.
12/15/2021	10:17 AM	311-08726230	City Vehicles or Permits	170 Mt Eden Parkway, Bronx	Various cars are parked on the crosswalk preventing wheelchair users from crossing the street safely.	12/15/2021	10:33 AM	The Police Department responded to the complaint and determined that police action was not necessary.
3/12/2022	2:46 PM	311-09633020	Illegal Parking - Blocked Crosswalk	East Mt Eden Avenue and Sheridan Avenue, Bronx		3/12/2022	3:18 PM	The Police Department responded to the complaint and determined that police action was not necessary.
3/12/2022	2:42 PM	311-09632990	Illegal Parking - Blocked Crosswalk	East Mt Eden Avenue and Selwyn Avenue, Bronx		3/12/2022	3:04 PM	The Police Department responded to the complaint and determined that police action was not necessary.

3/12/2022	2:47 PM	311-09633035	Illegal Parking - Blocked Crosswalk	East Mt Eden Avenue and Morris Avenue, Bronx		3/12/2022	3:18 PM	The Police Department responded to the complaint and determined that police action was not necessary.
3/12/2022	3:02 PM	311-09633149	Illegal Parking - Parking Permit Improper Use	East Mt Eden Avenue and Grand Concourse, Bronx		3/12/2022	3:19 PM	The Police Department responded to the complaint and determined that police action was not necessary.
6/7/2022	5:45 PM	311-10579640	Illegal Parking - Blocked Crosswalk	170 Mt Eden Parkway, Bronx		6/7/2022	7:29 PM	The Police Department issued a summons in response to the complaint.
6/8/2022	4:00 PM	311-10589425	Illegal Parking - Posted Parking Sign Violation	1650 Grand Concourse, Bronx		6/9/2022	5:33 AM	The Police Department responded to the complaint and with the information available observed no evidence of the violation at that time.
7/6/2022	8:55 PM	311-10926751	Illegal Parking	12 East Mt Eden Avenue, Bronx	Cars continue to park on the cross walk preventing wheelchair users from crossing the streets safely.	7/6/2022	9:16 PM	The Police Department responded to the complaint and determined that police action was not necessary.
7/8/2022	2:04 PM	311-10947314	Illegal Parking	12 East Mt Eden Avenue, Bronx	Various Cars parked at a cross walk every day.	7/8/2022	5:00 PM	The Police Department responded to the complaint and took action to fix the
9/19/2022	12:14 PM	311-11825291	Illegal Parking - Blocked Crosswalk	13 East Mt Eden Avenue, Bronx		9/19/2022	1:20 PM	The Police Department responded to the complaint and determined that police action was not necessary.

9/19/2022	12:04 PM	311-11825158	Illegal Parking - Double Parked Blocking Traffic	1650 Grand Concourse, Bronx		9/19/2022	1:19 PM	The Police Department responded to the complaint and determined that police action was not necessary.
9/26/2022	7:55 PM	311-11909790	Illegal Parking - Blocked Sidewalk	10 East Mt Eden Avenue, Bronx		9/26/2022	11:01 PM	The Police Department responded to the complaint and took action to fix the condition.
9/26/2022	7:57 PM	311-11909800	Illegal Parking - Blocked Crosswalk	13 East Mt Eden Avenue, Bronx		9/26/2022	11:01 PM	The Police Department responded to the complaint and took action to fix the condition.